

Exhibit 2



August 29, 2018

Via Electronic Mail (smiller@millerlegalpartners.com)

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Re: LP vs. James Hardie, *et al.*, Civil Action No. 3:18-cv-00447, United States District Court for the Middle District of Tennessee

Dear Mr. Miller,

On August 28, 2018, you put us on notice that LP intends to notice James Hardie's expert, Delwyn Kubeldis, for a deposition on September 10, 2018 in Nashville. As you are well aware, Judge McCalla decided during our discovery conference on August 14, 2018 that there would be no depositions of experts.

To that end, the Amended Scheduling Order (DE 168) provides for four depositions per side of fact witnesses only. Accordingly, James Hardie will oppose any effort to take the deposition of Mr. Kubeldis prior to the preliminary injunction hearing on September 24-25, 2018, as he is an expert witness in this matter. We, thus, ask that you withdraw the notice of deposition for Mr. Kubeldis. Additionally, Mr. Kubeldis is not a James Hardie employee, but rather is an expert witness for this matter. Thus, even if the Court permitted the deposition to occur, it would need to be conducted where Mr. Kubeldis resides.

Sincerely,

ADAMS AND REESE LLP



Rocklan W. King III

cc: Samuel Miller
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Brian T. Boyd
William M. Leech, III
Thomas Anthony Swafford
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